

**RHONDA KURZ and husband,**  
**KEITH KURZ,**  
  
**Plaintiffs,**  
  
**VS.**  
  
**WALMART, INC.,**  
  
**Defendant.**

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**No. \_\_\_\_\_**  
**JURY DEMAND (12-PERSON)**

to this Court a corporation organized and existing under the laws of the State of Delaware with its principal place of business in Bentonville, Arkansas. Walmart Inc. is a publicly traded company on the New York Stock Exchange and traded under the symbol WMT. No publicly traded entity owns more than 10% of Walmart Inc. The principal place of business for all entities mentioned is 702 S.W. 8th Street, Bentonville, Arkansas 72716.

Jurisdiction is conferred under 28 U.S.C. § 1332 relating to diversity of citizenship of the parties. The parties are citizens of different states.

The amount in controversy is in excess of the federal jurisdictional requisite of \$75,000. The complaint prays that “Plaintiffs be awarded a judgment against the Defendant in the amount of One Hundred Thousand Dollars (\$100,000.00).”

Defendant agreed to accept service of the complaint which it received via certified mail at its principal place of business in Bentonville, Arkansas on April 26, 2022. Fewer than thirty days have expired since Defendant received a copy of plaintiff’s complaint. This Notice of Removal is timely filed as set forth in 28 U.S.C. § 1446(b). WHEREFORE, Defendant hereby gives notice of the removal of this action pending in the Circuit Court of Cumberland County, Tennessee, to the United States District Court for the Middle District of Tennessee, Northeastern Division, and requests that the proceedings be held thereon.

/s/ Maria T. de Quesada  
G. Andrew Rowlett, No. 16277  
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Attorneys for defendant

### **CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing was electronically filed with the Court and was served by U.S. Mail, postage prepaid, upon:

Matthew J. McClanahan, Esq.  
McCLANAHAN & WINSTON, P.C.  
P. O. Box 1110  
Crossville, TN 38557  
[matt@tennadvocate.com](mailto:matt@tennadvocate.com)

this the 20<sup>th</sup> day of May, 2022.

/s/ Maria T. de Quesada